

JEFFERY S. CHIESA
Attorney General of New Jersey
State of New Jersey
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, New Jersey 08401

By: R. Lane Stebbins
Deputy Attorney General
(609) 317-6218

STATE OF NEW JERSEY
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. 12-0664-VC

STATE OF NEW JERSEY,)	
DEPARTMENT OF LAW AND)	
PUBLIC SAFETY, DIVISION OF)	
GAMING ENFORCEMENT,)	
)	
Complainant,)	Civil Action
)	
v.)	COMPLAINT
)	
BOARDWALK REGENCY)	
CORPORATION, LLC, d/b/a)	
Caesars Hotel and Casino,)	
)	
Respondent.)	
)	

Complainant, State of New Jersey, Department of Law and Public Safety,
Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic
City, New Jersey, 08401 says:

COUNT I
(Security Drop Box Pick-up)

1. Respondent, BOARDWALK REGENCY CORPORATION d/b/a CAESARS ATLANTIC CITY ("Caesars") is a New Jersey corporation having its principal place of business at 2100 Pacific Avenue, Atlantic City, New Jersey 08401.

2. Caesars is the holder of a plenary casino license first issued by the on October 25, 1980 and continuously renewed thereafter. At all times relevant herein, Caesars was authorized to conduct casino gaming within its casino hotel facility.

3. N.J.A.C. 13:69D-1.17(g) provides, in pertinent part, that:

The removal of drop boxes from a gaming table shall require, at a minimum, two casino security department members. One security member shall remain with the trolley. The second shall remove the empty drop boxes from the trolley, exchange each empty drop box with the drop box on the corresponding gaming table and place the drop box removed from the gaming table in the enclosed trolley.

4. On March 4, 2012, at approximately 6:39 a.m., Caesars employees assigned to the drop box pick up arrived at Pit 14. The drop box pick up employees removed an empty drop box from the trolley, but failed to remove the drop box from Poker Table 29 and, further, left the empty replacement drop box on the gaming floor.

5. At approximately 12:15 p.m. Caesars count room employees determined that the drop box from Pit 14, Poker Table 29, was missing and reported the

discovery to the surveillance department. Caesars count room employees properly documented the missing drop box.

6. At approximately 12:39 p.m. Caesars security department employees returned to Pit 14, Poker Table 29, where they removed the drop box from the table and replaced it with the empty drop box which had remained on the casino floor for approximately 6 hours.

7. Based upon the information in Paragraphs 1 through 6 above, Caesars, by its security personnel, removed an empty drop box from the trolley, but failed to exchange the empty drop box with the drop box on the corresponding gaming table and place the drop box removed from the gaming table in the enclosed trolley as required by N.J.A.C. 13:69D-1.17(g).

WHEREFORE, Complainant demands the following relief against Respondent, Caesars:

A. Judgment that on March 4, 2012, Caesars by its security personnel, removed an empty drop box from the trolley, but failed to exchange the empty drop box with the drop box on the corresponding gaming table and place the drop box removed from the gaming table in the enclosed trolley, in violation of N.J.A.C. 13:69D-1.17(g);

B. Judgment imposing against Caesars a civil monetary penalty, pursuant to N.J.S.A. 5:12-129(5);

C. Judgment imposing against Caesars such other and further relief as may be deemed just and appropriate under the circumstances.

D. Judgment imposing against Caesars such other and further relief as may be deemed just and appropriate under the circumstances.

COUNT II
(Drop Box Pick-up documents)

8. COUNT I is incorporated by reference herein and made a part hereof as if set forth at length.

9. N.J.A.C. 13:69D-1.17 (h) provides, in pertinent part, that:

For each pit where drop boxes are exchanged, a casino games supervisor shall record on a drop box verification form, at a minimum, the following:

1. The gaming date;
2. The trolley number;
3. The pit number; and
4. The number of empty drop boxes on the trolley for that pit.

10. N.J.A.C. 13:69D-1.17(i) provides, in pertinent part, that:

The casino games supervisor in (h) above shall:

1. Sign the drop box verification form before the trolley leaves the pit attesting that the number of drop boxes being removed from the pit equals the number of drop boxes that have been loaded on the trolley, and that the security

padlock on the trolley is locked prior to the trolley leaving the pit; and
2. Obtain the signature of a security department member on the drop box verification form attesting to the accuracy of such reconciliation and that the trolley has been secured with a locked padlock..

11. On March 4, 2012, the casino games supervisor in Pit 14 failed to accurately record on a drop box verification form the information required by N.J.A.C. 13:69D-1.17(h) and (i), in that he inaccurately represented on the drop box verification form that 32 drop boxes had been removed from Pit #14 when, in fact, only 31 drop boxes had been removed from the pit. The casino games supervisor signed the inaccurate form wrongly attesting to its accuracy.

12. On March 4, 2012, a member of the security department also signed the drop box verification form for Pit 14, which had been completed by the casino games supervisor and which contained inaccurate information.

13. Based upon the information in Paragraphs 8 through 12 above, Caesars, by its games and security personnel, failed to accurately record information on the drop box verification form and, thereafter, attested to the information on the form in violation of N.J.A.C. 13:69D-1.17(h) and (i).

WHEREFORE, Complainant demands the following relief against Respondent, Caesars:

A. Judgment that on March 4, 2012, Caesars, by its casino games supervisor, failed to accurately record information on the drop box verification form, in violation of N.J.A.C. 13:69D-1.17 (h);

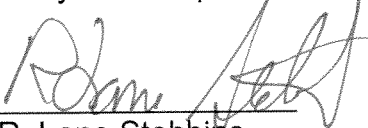
B. Judgment that on March 5, 2012 Caesars casino games supervisor and security department employee signed a drop box verification form containing inaccurate information, in violation of N.J.A.C. 13:69D-1.17 (i);

C. Judgment imposing against Caesars a civil monetary penalty, pursuant to N.J.S.A. 5:12-129(5); and

D. Judgment imposing against Caesars such other and further relief as may be deemed just and appropriate under the circumstances.

Respectfully submitted,

JEFFERY S. CHIESA
Attorney General of New Jersey
Attorney for Complainant

By: 
R. Lane Stebbins
Deputy Attorney General

Dated: *September 12, 2012*
A-03-12-023